

Kristina N. Holmstrom, SBN 10086
kristina.holmstrom@ogletree.com
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C
10801 W. Charleston Blvd., Ste. 500
Las Vegas, NV 89135
Telephone: 702-369-6800
Fax: 702-369-6888

*Attorneys for Defendant Hartford Life and Accident
Insurance Company*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

MARK POLSTON,

Plaintiff,

vs.

NORFOLK SOUTHERN CORPORATION
LONG-TERM DISABILITY BOARD OF
MANAGERS, AS PLAN ADMINISTRATOR
OF THE NORFOLK SOUTHERN
CORPORATION - RBO LONG-TERM
DISABILITY PLAN; HARTFORD LIFE
AND ACCIDENT INSURANCE
COMPANY, AS CLAIMS
ADMINISTRATOR FOR THE NORFOLK
SOUTHERN CORPORATION - RBO
LONG-TERM DISABILITY PLAN,

Defendants.

Case No.: 2:24-cv-01408

**STIPULATION AND ORDER TO
EXTEND TIME FOR HARTFORD LIFE
AND ACCIDENT INSURANCE
COMPANY TO RESPOND TO
COMPLAINT**

Pursuant to LR IA 6-1, LR IA 6-2 and LR 7-1, defendant Hartford Life and Accident Insurance Company ("Hartford") and plaintiff Mark Polston ("Plaintiff"), by and through their counsel of record, hereby request and stipulate to extend the time for Hartford to respond to Plaintiff's Complaint (ECF No. 1). Hartford's response to Plaintiff's Complaint is currently due August 27, 2024. Because defense counsel has just been retained in this case, the parties stipulate to a 30 day extension of time up to and including September 26, 2024, in which for Hartford to respond to the Complaint. This is the parties' first request for an extension of time.

This stipulation is made in good faith and is not intended for purposes of delay.

1 Dated this 20th day of August, 2024.

2 LAW OFFICE OF JULIE A. MERSCH

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

3
4 /s/ Julie A. Mersch

/s/ Kristina N. Holmstrom

5 Julie A. Mersch, SBN 004695

Kristina N. Holmstrom, SBN 10086

6 jam@merschlaw.com

kristina.holmstrom@ogletree.com

7 428 S. 4th Street

10801 W. Charleston Blvd., Ste. 500

8 Las Vegas, NV 89101

Las Vegas, NV 89135

9 Telephone: 702-387-5868

Telephone: 702-369-6800

10 Fax: 702-387-0109

Fax: 702-369-6888

11 *Attorneys for Plaintiff Mark Polston*

*Attorneys for Defendant Hartford Life and
Accident Insurance Company*

12 **IT IS SO ORDERED**

13 **DATED:** 9:33 am, August 21, 2024

14 

15 **BRENDA WEKSLER**

16 **UNITED STATES MAGISTRATE JUDGE**